



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

JAN 29 1999

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(Red)



SDMS DocID

2096200

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Broad Street Trust  
P.O. Box 180  
Carversville, PA 18913

Re: Chem Fab

Dear Broad Street Trust:

The U.S. Environmental Protection Agency (EPA) is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the above referenced Site. Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), your company is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above referenced facility or the surrounding area.

Section 104 of CERCLA, 42 U.S.C. Section 9604, authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information are provided below. Please respond for all materials which are potentially hazardous as well as the hazardous substances, pollutants and contaminants previously specified in this letter.

## INSTRUCTIONS

1) If asserting a business confidentiality claim on information submitted in response to this request, please clearly mark such information by either stamping or using any other such form of notice that such information is trade secret, proprietary, or company confidential.

## -QUESTIONS-

1. Please set forth the full name for the Broad Street Trust, and its mailing address. Also, set forth its agent for service.
2. What type of business entity is the Broad Street Trust?
3. If it is a corporation, state the type of corporation and the state of its incorporation.
4. Identify the principals, shareholders, partners, investors, etc., as applicable, of the Broad Street Trust.
5. If it is a corporation set forth the identity of its officers.
6. Does the Broad Street Trust, or any of the persons identified in the response to Question No. 4, have any current business relationships with Manfred Derewal, Jr., Manfred DeRewal, Sr. or Chem Fab, Inc.? Any past business relationships?
7. What is the Broad Street Trust's legal interest in the property formerly operated by Chem Fab, Inc.?
8. If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business

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confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

EPA may contract with one or more independent contracting firms (see attached list of EPA contractors and cooperative agreement grantees) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for agency personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. § 9604(e)(7) and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in the attachment, you must notify EPA in writing at the time you submit such documents.

You must respond in writing to this required submission of information within 10 calendar days of your receipt of this letter. For a corporation, the response must be signed by an appropriately authorized corporate official. For other entities, the response must be signed by an authorized official of that entity. If, for any reason, you do not provide all information responsive to this letter, in your answer to EPA you must: (1) describe specifically what was not provided, (2) supply to EPA a clear identification of the document(s) not provided, and (3) provide to EPA an appropriate reason why the document(s) was not provided.

All documents and information should be sent to:

Andrew Duchovnay (3RC22)  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

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If you have any question concerning this matter, please contact Andrew Duchovnay at 215-814-2484.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,



Larry S. Miller, Chief  
PRP Investigation and  
Site Info. Section

Enclosure

cc: A. Duchovnay 3RC22

List of Contractors

- Booz-Allen & Hamilton, Inc. - Contract # 68-W4-0010

Subcontractors to Booz Allen & Hamilton, Inc. are:

CDM-Federal Programs Corporation

Dynamac Corporation

PRC Environmental Management, Inc.

CACI, Inc.

Investigative Consultant Services, Inc.

Northeast Investigations

Tri-State Enterprises

- IT Corp. - Contract #68-S7-3005
- OHM Remediation - Contract #68-S7-3004
- Roy F. Weston, Inc. - Contract # 68-S5-3002  
Team subcontractors are:  
Foster Wheeler  
Tetra Tech EM Inc.  
RAI, Inc.  
CC Johnson & Malhotra

- Brown & Root Environmental  
a Division of Brown & Root, Inc. Contract #68-S6-3003

Brown & Root's subcontractors are:

Gannett Fleming, Inc.

Dynamac Corp.

C.C. Johnson & Malhotra, P.C.

- CDM Federal Programs Corporation - Contract #68-S7-3003
- Tetra Tech, Inc./Black and Veatch Waste Science and Technology Corporation.  
Contract # 68-S7-3002

List of Cooperative Agreements

- National Association of Hispanic Elderly - #CQ-825236
- National Senior Citizen Education & Research Center - #CQ-825529

Stick postage stamps to article to cover **First-Class postage**, certified mail fee, and charges for any selected optional services (*See front*).

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached, and present the article at a post office service window or hand it to your rural carrier (*no extra charge*).
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach, and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make an inquiry.

P 125 623 395

US Postal Service

# Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to \_\_\_\_\_

Broad Street Trust  
P.O. Box 180  
Carversville, PA 18913

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PS Form 3800, April 1995

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>

Postmark or Date